Stantec Consulting Services Inc.
100 Pearl Street 11th Floor
Hartford CT 06103
Tel: (860) 948-1628
Fax: (860) 948-1629

May 30, 2013

Kim Tisa (tisa.kimberly@epa.gov)
U.S. EPA New England
5 Post Office Square, Suite 100
Mail code: OSRR07-2
Boston, MA 02109-3912

Subject: **Limited Environmental Investigation**
Scope of Work
500 Flatbush Avenue
Hartford, Connecticut

Dear Ms. Tisa:

Stantec Consulting Services Inc. ("Stantec") is pleased to submit this scope of work for a limited environmental investigation of the 500 Flatbush Avenue property ("the Site")(Figure 1) on behalf of Danny Corp. (DC). Stantec submitted a Phase III Site Characterization Work Plan to EPA on November 30, 2012 (and revised on January 10, 2013). EPA reviewed the work plan and determined that the scope of work was not adequate to respond to the requirements of the Consent Agreement and Final Order (CAFO) dated September 13, 2006, as amended on August 16, 2011. The EPA determination was summarized in a letter to Attorney Alan Kosloff (representing DC) on April 30, 2013.

During a meeting on May 14, 2013, EPA and Attorney Dwight Johnson of Murtha Cullina, LLP (representing DC) reached an agreement to submit a proposed scope of work for a limited environmental investigation by May 30, 2013. The scope of work presented in this document responds to the May 14, 2013 agreement. The scope of work contained in this document is limited in nature and not designed to comply with the environmental investigation requirements contained in 40 CFR Part 761.61, Subpart N (self-implementing site characterization requirements) or 40 CFR Part 761.61 (a)(2)(risk-based disposal approval process). In addition, the scope of work does not fully satisfy the Phase III site characterization requirements of the CAFO, as amended, in a manner than would enable the development of a remedial action plan. However, we believe that the scope of work will demonstrate that the nature and extent of PCB contamination is limited and provide a framework for developing future investigation and remediation activities at the Site.

Methodology

The scope of work was developed to provide three dimensional site characterization data for Areas of Concern (AOCs) identified in functional areas at the Site. The functional areas and scope of work are presented in the attached table, and illustrated on Figure 2. Stantec conducted a site inspection of the property on May 21, 2013, to evaluate current conditions and develop the scope of work.

The scope of work includes drilling and soil sampling, concrete chip sampling, sediment sampling, and laboratory analysis of samples for PCBs by EPA Method 8082 using the Soxhlet extraction procedure (EPA Method 3540C). All soil and sediment samples will be collected and analyzed as grab samples. All concrete samples will be collected as composite samples from closely spaced holes drilled to 0.5-inches within a one square foot area. The scope of work also includes the collection of laboratory duplicates and/or Matrix Spike/Matrix Spike Duplicates (MSMSD) at a rate of 10-percent of the total number of samples collected and analysis using State of Connecticut Reasonable Confidence Protocols (RCPs). Laboratory analysis will be provided by Spectrum Analytical, Inc. of Agawam, Massachusetts.

In general, samples will be collected at each boring continuously from the surface to 15 feet below grade (fbg). This depth was selected because the resulting data will allow evaluation of soils for compliance with the Direct Exposure Criteria (DEC) contained in the State of Connecticut Remediation Standard Regulations (§22a-133(k), 1 through 3. Since PCBs are characterized by extreme insolubility, it is unlikely that exceedances of the GB Pollutant Mobility Criteria (GB PMC) exist. Notwithstanding, Stantec will analyze ten soil samples containing the highest total PCB concentrations measured by the lab for leachable PCBs by the Synthetic Precipitate Leaching Procedure (SPLP).

Samples from each boring will be collected from alternating depth intervals spaced every other foot and submitted to the lab for analysis, as indicated on the attached table (e.g. 0-1 fbg, 2-3 fbg, 4-5 fbg, etc.). Should we observe soil staining at a depth that is not designated for lab analysis, we may change the samples selected for lab analysis to enable analysis of these soils. In addition, we may select a few additional samples for lab analysis should we deem such sampling necessary. Final sample submittal decisions will be based on field screening results during sampling.

Soil samples from the Shredder area will be submitted for lab analysis at an increased depth frequency near the surface, as indicated on the attached table. Samples will be collected from the top three inches of soil (0-0.1, 0.1-0.2, 0.2-0.3) and 0.5-1.0 fbg to evaluate the hypothesis that soils impacted with fluff from the shredder attenuate rapidly with depth. Deeper soil samples will then be collected at alternating one foot intervals to 15 fbg at each boring.

Soil samples from beneath the proposed City of Hartford roadway will be collected to a terminal depth of 5 fbg, which is the maximum depth of soil disturbance that we anticipate during roadway construction.

Stantec notes that soil samples collected by Weston Solutions, Inc. (Weston) near the crusher and baler pits (in the Main Building) were only advanced a few feet beneath the slab. As such, the soil samples collected by Weston may not have been advanced below the base elevation of the pits. Borings that we propose in these locations will be advanced to 15 fbg and will exceed the base elevation of the pits.

All soil borings will be advanced with a truck mounted Geoprobe operated by Martin GeoEnvironmental, Inc. Equipment decontamination procedures are discussed in subsequent sections.

Sampling Procedures

Soil and concrete samples will be collected with steel spades, shovels, a pneumatic hammer, and other hand tools. Where possible, samples will be collected with disposable plastic scoopulas. If hand tools need to be re-used, the tools will be decontaminated between sampling points using the decontamination procedures specified in 40 CFR §761, Subpart S. Each location will be backfilled to the surface with bentonite chips.

Concrete samples will be collected as a composite of concrete from 10-12 closely spaced holes drilled using a pneumatic hammer in a one square foot area at each station. Samples will be collected from 0 to 0.5-inches. Concrete in the APS building will not be evaluated because concrete sampling has already been conducted in that building.

Health & Safety Plan

The sampling will be completed under a Health and Safety Plan (HASP) that complies with the Occupational Safety and Health Administration (OSHA) 1910.120 (Hazardous Waste Operations)(HAZWOPER) standard. The HASP will be reviewed by the field team prior to sampling. The HASP will be signed daily by the field personnel working on the project.

Sampler Exposure Considerations

Based on our experience, sampling PCB impacted soils and concrete with hand tools does not result in significant exposure to PCBs. On a similar project conducted in West Hartford in 2009, STANTEC retained Smith & Wessel Associates (SWA) to conduct a Negative Exposure Assessment (NEA) for samplers collecting samples from concrete using powered pneumatic hammer drills. During the NEA, personal air samplers were used to collect air in the worker breathing zone. Samples were analyzed for airborne PCBs using National Institute of Occupational Safety and Health (NIOSH) Method 5503. PCBs were not detected above analytical detection limits. STANTEC views concrete sampling as much more likely to result in worker exposure to airborne PCBs. As such, the existing NEA performed by SWA is likely to represent a worse case than soil sampling and is thus suitable for determining that respiratory protection is not needed for soil or concrete sampling. Should EPA wish to review the NEA, STANTEC will provide the NEA upon request.

Sample Containers

Samples will be containerized in the field in 4 oz. amber jars with wide mouth necks. If necessary, grab samples will be homogenized before they are containerized in food grade high density polyethylene (HDPE) disposable bowls and scoops. If the samples can be homogenized in the sample containers, then a separate field homogenization step may not be necessary. The field team will determine the need for additional homogenizing during sampling.

Investigation Derived Waste

Investigation derived wastes (IDW) including gloves, sampling scoops, bowls, decon rinsewater, and other wastes generated during the course of sampling. If all sample results contain PCBs below 1 mg/kg, then the IDW will be disposed as non-regulated solid waste. If samples contain PCBs above 1 mg/kg, then the IDW will be containerized and disposed off-site as presumed PCB remediation wastes (>50 ppm). We anticipate that less than three 55-gallon drums of IDW will be generated during the sampling project.

The IDW drums will be secured in an enclosed and locked in the Main Building and labeled with the M_L mark. The drummed waste will be disposed according to PCB sample concentration. We will segregate IDW for each functional area.

Sampling Team

The sampling team will consist of up to two geologists and a drilling subcontractor. Each sampler will be responsible for removing asphalt with hand tools if necessary, sample collection, sample labeling, sample transport and management, and record keeping.

After sample collection, all samples will be immediately placed in a cooler and stored at 4 degrees Celsius prior to delivery to the laboratory.

Sample Management, Delivery and Analytical Methods

At the end of each sampling shift, samples will be transported to the laboratory by courier. The samples will remain under custody of the lab courier until they are relinquished to the lab for analysis.

Each grab sample will be submitted for PCB analysis by EPA Method 8082 using the Soxhlet extraction procedure (EPA Method 3540C).

Decontamination Procedures

All equipment that comes into contact with sample media will be thoroughly decontaminated after each use to prevent sample cross-contamination. Decontamination procedures will include washing equipment with a stiff bristle brush in a detergent and water solution, rinsing with tap water, rinsing with pesticide grade laboratory hexane (20 ng/L impurities or less), and air drying. Care will be taken to avoid contaminating the drilling equipment between sampling locations.

At the end of the project, the back end of the rig and tooling will be decontaminated on a decon pad in accordance with the double wash/rinse procedure contained in 40 CFR Part 761, Subpart S. Decon water and the decon pad will be containerized for disposal in drums, marked with the

M_L mark, and presumed PCB waste (>50 ppm). Decon wastes will be stored with IDW in a locked room in the Main Building before off-site disposal.

Sample Identification

A sample identification (ID) code consisting of up to 4-characters will be used to uniquely identify each sample. The sample ID's will be unique to this sampling event.

Quality Control Sample Designations

Those samples to be collected for quality control will be determined in the field and selected randomly. Samples submitted for quality control as duplicates will be numbered Dup-1, Dup-2, Dup-3, etc. The duplicates will be submitted as blind duplicates. The location of each duplicate will be logged in the field notebook but not disclosed to the laboratory.

Samples submitted as Matrix Spike/Matrix Spike Duplicates (MS/MSDs) will be designated MS/MSD in the comments section of a particular sample location.

One Performance Evaluation (PE) sample will be submitted to the lab for analysis. The PE sample will be obtained from a source used for environmental quality control analysis. The PE sample will be designated PE-1. The reference concentration will not be disclosed to the laboratory.

Chain of Custody

Each sample will be logged on a chain of custody (COC) for submittal to the laboratory for analysis. All Samples will be designated as grab samples. The sampling team will designate all samples for 10-day turnaround time (TAT). The sampling team will mark all COCs as requiring a RCP report. MS/MSDs will be noted in the comments section of each chain of custody.

Sample Container Labels

Waterproof, gummed labels obtained from the laboratory will be used to identify sample containers. Each sample will be labeled immediately upon collection and include the following information: sample ID number, the name of the project, sample location, and requested analysis type. The sample date, time, and sampler's initials will be recorded during field sampling. The lid of each container will also be marked to provide a secondary means of sample identification should labels fall off of the containers.

Logbooks

Each sampling team will maintain a logbook to record sample data such as time, date, sample location, QC sample locations, and sample observations if any (e.g. staining or odors). Each page of the logbooks will be signed by the individual recording information in the logbook. At the end of the project, the logbook data will be appended to the report as an appendix.

Data Quality Analysis

Upon receipt of the data, Stantec will perform a data quality analysis to ensure that the data are valid and usable in the future for remedial decision making.

Report Preparation

Stantec will prepare a summary report that presents the data, our findings, a revised draft Conceptual Site Model (CSM), and conclusions.

Please call me at (860) 948-1628 x 7113 should you have any questions or comments.

Sincerely,

John H. Insall, LEP
Stantec Consulting Services Inc.

Attachments: Sampling Matrix
Figure 1
Figure 2

cc: Michael Suisman (Danny Corp.)
Dwight Johnson, Esq. (Murtha Cullina, LLP)
Alan Kosloff, Esq. (Law Offices of Alan Kosloff)